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June 25, 2024

**VIA ECF**

The Honorable J. Paul Oetken  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Jackson v. American Civil Liberties Union, Inc., et al.*, No. 21-cv-5037(JPO)

Dear Judge Oetken:

We represent Plaintiff Robert Jackson in this action and write pursuant to Rule 2(E) of Your Honor's Individual Rules to respectfully request permission to file the following documents under seal in connection with Defendants' Motion for Summary Judgement (see ECF Nos. 85-91): (i) Plaintiff's Memorandum of Law in Opposition to Defendants' Motion to Dismiss, (ii) Plaintiff's Local Rule 56.1 Counterstatement of Facts, and (iii) the Declaration of Taylor J. Crabill in Opposition to Defendants' Motion for Summary Judgment.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "T. Crabill", written over a light blue horizontal line.

Taylor J. Crabill